

United States District Court

CENTRAL/NORTHERN DISTRICT OF UTAH

FILED IN UNITED STATES DISTRICT COURT DISTRICT OF UTAH

AUG 5 - 2004

MARKUS B. ZIMMER, CLERK
EXHIBIT AND WITNESS LIST
DEPUTY CLERK

CASE NUMBER: 202-CV-00010

Wardell v. Pure

PRESIDING JUDGE <i>Paul Cassel</i>					PLAINTIFF'S ATTORNEY <i>Ken Kay</i>	DEFENDANT'S ATTORNEY <i>Richard Herriksen</i>
TRIAL DATE(S) <i>8-6-4 through 8-6-04</i>					COURT REPORTER <i>Tracy Robinson</i>	COURTROOM DEPUTY <i>Justin Little</i>
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1		<i>8-6-4</i>	<i>None</i>	7/30/2004	E-mail dated 6/5/2004 from Joani to Ken Kay; Subject: Negative Press - Review of Schools which includes Ivy Ridge (001-008)	
2			<i>None</i>		Letter from Randall Hinton regarding interaction with Susan Scheff and her involvement in the parent referral program (009)	
3				7/30/2004	Graph: Student Census 1999 - 2004 (010)	
4				7/30/2004	Affidavit of Susan Scheff; Case # 2:02CV 0010ST; 2/16/2002 (011-013)	
5				7/30/2004	Commitment Letter dated 8/8/2000 from Susan Scheff to Ashlyn Scheff (014-017)	
6				7/30/2004	Teen Help Pre-Admission Screening Form (018-019)	
7				7/30/2004	5 Events by Ashlyn Scheff; 8/13/2000 (020-022)	
8				7/30/2004	Carolina Springs Academy Enrollment Agreement for Ashlyn Scheff (023-059)	
9				7/30/2004	Letter dated 10/30/2000 from Susan Scheff to Elaine Davis/CSA; Re Visit to CSA (060)	
10				7/30/2004	Focus Seminar Letter from Susan Scheff to Elaine Davis (061-062)	
11				7/30/2004	E-mail dated 11/7/2000 from Susan Scheff; Regarding referral ideas and reflecting dedication to program (063-065)	
12				7/30/2004	Letter dated 11/9/2000 from Susan Scheff to Elaine Davis/CSA; Re: Ashlyn Scheff and problems with another WWASP family (066)	
13				7/30/2004	Charge of Discrimination dated 10/20/2000 by Susan Scheff against Kellstrom Industries (067)	
14				7/30/2004	Letter dated 11/11/2000 from Susan Scheff to Elaine Davis/CSA; Re: Ashlyn Scheff - 60 day written notice of withdrawal (068)	
15				7/30/2004	E-mail dated 2/11/2001 from Susan Scheff to Nelson Shumway; Request for commitment letter and proclaiming support of program (069)	
16				7/30/2004	Follow up form for Ashlyn Scheff (070)	
17			<i>✓</i>	7/30/2004	E-mail dated 2/21/2001 from Susan Scheff to Lisa Irving; Requesting a list of parents who do not want the Scheffs' attendance at the support meetings; PURE information sent to many WWASP parents (071-072)	
18				7/30/2004	PURE Website; Welcome Board as of 2/27/2002 (073)	

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* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

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19				7/30/2004	PURE Website; Frequently Asked Questions; Services; About Us; February 2002 e-Newsletter (074-083)
20				7/30/2004	E-mail dated 12/28/2001 regarding the evaluation of needs by a qualified Educational Consultant (084)
21				7/30/2004	E-mail dated 10/12/2002 from Susan Scheff; Re: IECA Conference (085)
22				7/30/2004	PURE Website; March 2002 e-Newsletter - PURE Promotes Parent (086-089)
23				7/30/2004	Safe and Sound Youth Transportation, Inc; Employee Information (090-091)
24				7/30/2004	E-Mail dated 6/26/2003 from Marie Peart to Susan Scheff; Re: Programs and e-mail from Annette (092-093)
25				7/30/2004	PURE Website; Welcome Board as of 4/19/2003 (094)
26				7/30/2004	Fornits' Home for Wayward Web Forum; The Teen Help Industry; PURE, can you make my kind love me again?; PURE putting parent in contact with Susan Scheff (095-096)
27				7/30/2004	E-mail dated 11/7/2003 from Marie Peart to Susan Scheff; Re: Names from Shane and consultations with professionals through PURE (097-101)
28				7/30/2004	PURE, Inc Profit & Loss 02/2001-12/2001 & 01/2002-12/2002; Statement of Revenues and Expenses for the 1 Quarter and 4 Quarters Ended 12/31/2003 (102-107)
29				7/30/2004	Lists of Payments for Referral Fees to Susan Scheff (108-114)
30				7/30/2004	E-mail dated 9/10/2004 between Susan Scheff and parent; Re: PURE not being a referral paid organization (115-118)
31				7/30/2004	E-mail dated 9/5/2002 from Susan Scheff to Jeannette Daniels; Regarding Daniels being a WWASP promoter and having their links on her website (119-120)
32				7/30/2004	Bridge to Understanding Forum; Re: Hidden Referral Fees / Struggling Teens Woodbury Website; Posted by Tom Croke 1/01/2002 (121-122)
33				7/30/2004	E-mail dated 11/3/2003 from Marie Peart to Justin Sorenson; Re: Possible new admit / referral to High Top Ranch and questions about past referrals (123-125)
34				7/30/2004	E-mails dated 6/27/2003 - 6/30/2003 between Marie Peart and Susan Scheff; Re: Ginger being off website as soon as they get a check (126-127)
35				7/30/2004	PURE November 2002 e-Newsletter - The Positive "Boot Camp" A Month to be Thankful - The Expansion of PURE (128-129)
36				7/30/2004	E-mails dated 6/26/2003 between Marie Peart and Susan Scheff; Re Ginger and Reality Ranch referrals (130-131)
37				7/30/2004	PURE e-Newsletters; List of topics by month from January 2002 to January 2004 (132-133)
38				7/30/2004	Letter dated 8/6/2002 from Susan Scheff to Bill Robitzek; Re: Summit Achievement Damages to PURE (134-136)
39				7/30/2004	E-mails dated 7/24/2003 between Svetlana Doyle and parent; Regarding recommendation of programs and referral to Marie Peart; Email dated 7/29/2003 from Marie Peart to Susan Scheff discussing the parent's lack of finances (137-139)
40				7/30/2004	Bridge to Understanding Forum; Re: Skyline Journey Challenge.. "Three Peaks in a Week"; Posted by Susan Scheff 12/22/2001 (140)
41				7/30/2004	E-mail dated 12/20/2001 from Susan Scheff; Re: Recommendation of programs and schools which are fully licensed and accredited with a proven success record (141-142)
42				7/30/2004	Oak Ridge Military Academy Contractual Agreement with Susan Scheff of PURE dated 3/21/2001 (143)

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43				7/30/2004	E-mail dated 3/25/2002 from Norma Hallman; Re: PURE only recommends safe and qualified schools with which they have first hand experience (144-146)
44				7/30/2004	E-mail dated 3/25/2002 from Norma Hallman; Re: Reply from PURE recommending programs to parent (147-149)
45				7/30/2004	E-mail dated 3/26/2002 from Susan Scheff; Re: Reply from PURE recommending programs to parent (150-152)
46				7/30/2004	E-mail dated 9/26/2002 to/from Norma Hallman; Re Reply from PURE recommending programs to parent, noting that all schools recommended have been visited and giving financing options (153-154)
47				7/30/2004	E-mail dated 9/03/2002 from Norma Hallman; Re: Reply from PURE recommending programs to parent which have been thoroughly investigated (155-156)
48				7/30/2004	E-mail dated 12/03/2001 from Susan Scheff; Re: Reply from PURE; Recommending military school (157-158)
49				7/30/2004	E-mail dated 2/08/2003; Re: HelpYourTeens.com and the recommendation of a military school (159)
50				7/30/2004	E-mail from Svetlana Doyle; Re: Program recommendations including Reality Ranch (160-161)
51				7/30/2004	E-mails dated 8/19/2002 between Mark and Susan Scheff; Regarding the request for information about the CEDU program and referral to Dale (162-163)
52				7/30/2004	PURE Website; A Parents' True Story by Susan Scheff as of 4/17/2003 (164-168)
53				7/30/2004	E-mail dated 8/17/2004 from Kevin Richey to Ken Kay; Regarding Susan Scheff saying that the programs were good and asking him to manipulate the referral system (169)
54				7/30/2004	E-mail dated 5/7/2003 from Susan Scheff; Re: PURE Rebuttal, a website created by WWASP (170)
55				7/30/2004	E-mail dated 4/28/2003 from Susan Scheff; Re: Research Alert - Bob Lichfield being convicted of sexual misconduct with a female student in Utah (171)
56				7/30/2004	E-mail dated 2/23/2003 from Susan Scheff; Regarding Montel's show and Paula Reeves's son being kicked out of Sorenson's Ranch School and blaming it on PURE (172)
57				7/30/2004	Strugglingteens.com; A Parents' True Story by Susan Scheff posted 8/23/2001 (173-177)
58				7/30/2004	Struggling Teens Interactive Forum; Message Board Postings (178-286)
59			✓	7/30/2004	Bridge to Understanding; Susan Scheff and the Pure Foundation by Tom Croke 1/3/2002 (287-289)
60				NULL	Ten Suggestions for Parents in Dealing with a Homesick Cadet (290-291)
61				7/30/2004	Woodbury Reports; Struggling Teen Discussion; Message Board Postings (292-366)
62				7/30/2004	E-mail dated 5/15/2003 from Susan Scheff; Regarding that Scheff does not fear Woodbury, she despises him and people losing credibility by writing statements that are not true; Casa and Hi Impact are not together (367)
63				7/30/2004	Woodbury Reports; Struggling Teens Interactive Forum; Topic: Clarification on High Impact; Posted 12/28/2001 (368-370)
64				7/30/2004	E-mail dated 4/15/2003 from Susan Scheff; Requesting help in gathering information for her case against WWASP with letter from Aaron Flater (371-372)

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65				7/30/2004	E-mail dated 9/5/2002 from Susan Scheff; Re: WWASP accusations and defenses (373-374)
66				7/30/2004	E-mail dated 1/06/2003 from Nancy Colburn and Susan Scheff; A warning to be careful when speaking to parents - only give facts and let them decide; Nancy will do follow up with a parent and be careful (375-376)
67				7/30/2004	E-mails dated 6/17/2002 - 6/18/2002; Advising against WWASP / Tranquility Bay (377-384)
68				7/30/2004	E-mails from Susan Scheff; Re Fully Baked ListServ; Purpose is to expose WWASP, Restructuring of the List, and the confidentiality of the List (385-388)
69				7/30/2004	E-mails dated 2/28/2003 - 3/01/2003 between Susan Scheff and Carey Bock; Re: Confidential, Sending a post from a parent on BBS and possible contact (389-391)
70				7/30/2004	E-mail dated 9/3/2002 from Susan Scheff; Request that Scheff e-mail a parent to warn them against Casa (392)
71				7/30/2004	E-mail dated 8/24/2002 from Susan Scheff; Re: Writing a parent who has requested information on Casa (393)
72				7/30/2004	E-mail dated 8/24/2002 from Susan Scheff to Jeff Berryman; Re: Scheff needs an e-mail address to give requested information; WWASP spamming (394)
73				7/30/2004	E-mail dated 9/02/2002 from Susan Scheff; Regarding removal of child from WWASP program (395)
74				7/30/2004	E-mails dated 5/14/2003 from Susan Scheff to Carey Bock; Re: Debbie Thompson working on their case (396-397)
75				7/30/2004	E-mail dated 5/17/2003 from Cristine Mocha to Carey Bock; Re: Referrals to PURE often defers parents from sending their child to the programs. Have to stop Carey (398)
76				7/30/2004	E-mail dated 10/24/2002 from Susan Scheff; Re: Op / Tranquility Bay - Should only give facts, not say pull the child (399)
77				7/30/2004	Letter from to WWASP parent from Susan Scheff (400)
78				7/30/2004	E-mail dated 10/06/2002 from Susan Scheff to Carey Bock; Re: Referring a WWASP parent to people where they can get negative information (401)
79				7/30/2004	E-mail dated 8/21/2002 from Susan Scheff; Re: Bob Lonsberry needs to be contacted (402)
80				7/30/2004	E-mail dated 8/06/2002 from Susan Scheff to Jeff Berryman; Re: Stopping families from joining WWASP programs (403)
81				7/30/2004	E-mail dated 8/19/2002 from Susan Scheff; Re: Stopping another parent from placing their child in a WWASP program (404)
82				7/30/2004	E-mail dated 9/05/2002 from Susan Scheff; Re: Parent thanking for the warning against WWASP (405)
83				7/30/2004	E-mail dated 11/03/2002 from Susan Scheff; Re: Story stopped parents previously 100% sold on Casa (406)
84				7/30/2004	E-mail dated 4/10/2003 from Susan Scheff to Carey Bock; Re: Welcome back and an update on who is on the list (407)
85				ALL	E-mail dated 12/29/2002 from Blanche; Re: Susan Scheff not making money from PURE (408)
86				7/30/2004	E-mail dated 5/12/2003 from Susan Scheff; Re: Cases in Federal District Court for Utah against Teen Help et al (409)
87				7/30/2004	E-mail dated 10/09/2002 from Susan Scheff to Carey Bock; Re: New show called Final Justice with Erin Brockovich as the commentary, Try to get on show (410)
88				7/30/2004	E-mail dated 10/09/2002 from Susan Scheff to Carey Bock; Re: John Dahlberg - LA Times article is finished; Update on cases against WWASP (411)

VS.

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